

# LOCHCP – Public Comments received during EIR/NEPA Scoping Meeting

## **ENVIRONMENTAL/BIOLOGICALLY-RELATED**

Baywood Fine Sands are not good for mitigation lands. Mitigation lands will need to be sourced from outside the Urban Reserve Line. As a result, the broader area of effect will need to be analyzed.

What about considering other habitats besides the Coastal Dune Scrub community?

How are other species going to be looked at? What is the mechanism to be used to evaluate potential presence? There may be other 'endangered' plants for inclusion in HCP – such as the salt marsh birds beak, and wildlife, such as the legless lizard. What about Spinning Yarn lichen?

Has the Morro Shoulderband Snail been downgraded to threatened from endangered?

Are Kangaroo Rats extinct in the area and if so why are they being included in the HCP?

Under Population/Housing – is growth inducing going to be discussed in environmental document?

Morro Shoulderband Snail – does that fact that more occurrences of this species than expected have been found during construction of the sewer mean that it might be delisted? If that occurs and the K-rat is determined to be extinct, is the HCP needed for just two plants?

Information from the Wastewater Treatment Plant/Sewer EIR should be used for the setting in the CEQA/NEPA document as it is a good source of information.

Growth inducement – should be considered attributable to the HCP/Basin Plan/WWTP in equal parts.

Another person disagreed with this and said it was not attributable to the HCP as growth could occur through the individual ITP process instead as is the case at the moment.

Is climate change going to be considered?

How will fire/fuel modification and manzanita removal be addressed?

## **ALTERNATIVES**

Suggested CEQA Alternative - considered landscape maintenance alternative that includes funding for acquisition/ maintenance of previously unfunded/unmanaged lands for habitat conservation/enhancement, such as any surrounding greenbelt areas.

No Project Alternative – should be considered and analyzed in detail.

Would the bike lane area property (So Bay Blvd) be a good candidate for preservation?

## **HABITAT CONSERVATION PLAN**

Habitat Preservation needs to be supported by an endowed fund. Costs for invasive weed (e.g., veldt grass) management of preserved lands should be included.

The LCP amendment for the area was not certified by the Coastal Commission previously.

Why isn't a joint Natural Communities Conservation Plan being considered?

How will the HCP and EIR/NEPA be coordinated, including the development of a detailed project description?

In the past the greenbelt has been the cornerstone of the HCP. Will the HCP include parcels, description, mapping indicating which are to be preserved?

What is the timeline for completion of the HCP and associated environmental documentation? Will 'delays' be built in? What development timeframe will be used (e.g., 30 year planning horizon? Buildout?)

How much of the earlier HCP documents have survived?

How much of a lot needs to be preserved when species found? What will be the cost?

Will individual surveys of parcels continue to be required when applying for future development projects? If so what is the benefit/cost savings associated with the HCP?

Should be noted that the Basin plan still needs to be approved before development can occur. This could affect the timeline for implementation of the HCP.

Cal Fire activities should be considered for inclusion as covered activities under the HCP.

Should consider a 30+ year permit term for the HCP or tie it in with the payoff time of the sewer.

How expensive will future permits be as a result of the HCP process?

What are the costs of these permits? Who is going to pay for the mitigation lands?

How is mitigation land chosen?

Will habitat areas need to be large or contiguous with areas to be protected?

## **OTHER**

County has growth cap of 2.3% in place. Based on growth levels in other coastal communities this will likely be more like 1%.

Willow is a protected wetland tree. The changeover to the sewer is going to affect the hydrological regime in the area and may result in impacts on willow groves. Will this be addressed?

Water in LOS 3 under RMS – How can growth occur under this status?